




Re: Surface thresholds 
Vickie Pane to: David Rosoff

07/30/2012 02:48 PM

From: Vickie Pane/R2/USEPA/US
 To: David Rosoff/R2/USEPA/US@EPA

There are two reference paragraphs for porous surfaces. Both are used to "clean up for continued use"

The first - 761.79(b)(4) is a decontamination standard for concrete as measured by a standard wipe test. It can only be used if the decontamination procedure commences within 72 hours of the initial spill of PCBs to the concrete being decontaminated.

The standard is $\leq 10 \mu\text{g}/100\text{cm}^2$

The second - 761.30(p) - is for continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs.

It says that anyone can use porous surfaces contaminated by spills of liquid PCBs at concentrations $> 10 \mu\text{g}/100\text{cm}^2$ (there is no stipulated upper limit in the regs) for the remainder of the useful life of the surfaces and subsurface material if certain conditions are met. The conditions include:

- removal of the source of PCB contamination.
- double wash rinse to remove surface PCBs and allow to dry for 24 hours.
- Then completely cover with two solvent resistant and water repellent coatings of contrasting colors ...or a solid barrier fastened to the surface converging the contaminated area.
- Marking with the PCB Mark in a location easily visible and over the encapsulated area.

At the time I left the PCB world there was discussion at HQ about eliminating this paragraph and/or adding strict limitations.

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United States Environmental Protection Agency

David Rosoff

And the porous surface reference? Thanks for t... 07/30/2012 01:07:02 PM

From: David Rosoff/R2/USEPA/US
 To: Vickie Pane/R2/USEPA/US@EPA
 Date: 07/30/2012 01:07 PM
 Subject: Re: Surface thresholds

And the porous surface reference?

Thanks for this.

Vickie Pane

----- Original Message -----

From: Vickie Pane
Sent: 07/30/2012 12:18 PM EDT
To: David Rosoff
Subject: Re: Surface thresholds

Hi Dave-

I copied some paragraphs from the regs to try to further explain the cleanup levels we look for in applications for onsite disposal of PCBs. The cleanup levels are based on the occupancy of the area in its future use. These are for self-implementing approvals, which have some applicability restrictions; such as, they may not be used to cleanup surface or ground waters, etc.

That is why Unimatic had pursued a risk-based approach.

[attachment "Cleanup levels.docx" deleted by David Rosoff/R2/USEPA/US]

For your quick reference, I saved this file to the "Unimatic" folder on my R drive, to which you should have access.

Please let me know if you have any additional questions.

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David Rosoff

For PCB wipe samples. Do you guys have num...

07/27/2012 02:29:42 PM